Case 1:19-cv-11213-MKV Document 55 Filed 10/16/20 Page 1 of 1

TAMIR LAW GROUP PC

Attorneys & Counselors at Law 225 Broadway, 39th Floor New York, New York 10007

p (212) 444-9970 | f (212) 444-9971 | isaac@tamirlawgroup.com | www.tamirlawgroup.com

October 16, 2020

Via ECF

Honorable Mary Kay Vysckocil United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: Eretz Goshen Farms Inc. et al. v. Auto Cure LLC et al. 19-cv-11213-MKV

Dear Honorable Vysckocil:

This law firm represents plaintiffs Eretz Goshen Farms Inc. and Warner Bass, ("Plaintiffs") in the above referenced matter. We write to the Court in response to your order of September 3, 2020, in which the Court ruled that Plaintiffs must serve any amended complaint within thirty days of filing on the defendants Auto Cure, LLC, Cole Ducey, and Joseph Ducey. Plaintiffs filed an amended complaint on September 17, 2020 and seek additional time to complete service on defendants Cole Ducey and Joseph Ducey.

Initially, it took almost two weeks to obtain amended summonses for the amended complaint from the Clerk's Office. Plaintiffs have confirmation that defendant Auto Cure, LLC was served today with the New Mexico Department of State.

With respect to serving the individual Ducey defendants, Plaintiffs are still attempting to locate them and have yet to serve them with the amended complaint. We thus herein request an additional thirty days to locate them to complete service or to request alternative service.

For the aforementioned reasons, Plaintiffs request that the Court grant the additional time to complete service on defendants Cole Ducey and Joseph Ducey.

Respectfully submitted,

Zaki Isaac Tamir, Esq.